

From: ["Gravatt, Dan" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE:GROUP \(FYDIBOHF23SPDLT\)/CN=RECIPIENTS/CN=AA541C35E726461A8D36825C87A211A2-GRAVATT,DAN>](mailto:Dan.Gravatt@epa.gov)

To: [Field](#)
[Jeff;Tapia](#)
[Cecilia;Sanders](#)
[Steven](#)

CC:

Date: 7/14/2014 9:00:29 AM

Subject: FOR REVIEW: Missouri Electric Works, response to MDNRcomments on five-year review (FW: MEW)

Attachments: [July 9.docx](#)
[Response to MDNR comments on Third FYR.docx](#)

Jeff, Cecilia, Steve,

See attached MDNR's comments on our MEW five-year review, which are more policy issues than specific comments on the FYR. I felt we needed to respond to MDNR's concerns positively so I drafted the attached response letter. Please take a look and let me know if (a) this approach is acceptable, and (b) if so, any changes to the language of the letter.

Sincerely,
Daniel R. Gravatt, PG
US EPA Region 7 SUPR/MOKS
11201 Renner Boulevard, Lenexa, KS 66219
Phone (913) 551-7324

Principles and integrity are expensive, but they are among the very few things worth having.

From: Van Dyke, Don [mailto:Don.VanDyke@dnr.mo.gov]
Sent: Wednesday, July 09, 2014 11:59 AM
To: Gravatt, Dan
Subject: RE: MEW

Dan,

Draft is attached, hard copy to follow.

From: Gravatt, Dan [<mailto:Gravatt.Dan@epa.gov>]
Sent: Wednesday, July 09, 2014 7:19 AM
To: Van Dyke, Don
Subject: RE: MEW

Any progress on this?

Daniel R. Gravatt, PG
US EPA Region 7 SUPR/MOKS
11201 Renner Boulevard, Lenexa, KS 66219
Phone (913) 551-7324

Principles and integrity are expensive, but they are among the very few things worth having.

From: Van Dyke, Don [<mailto:Don.VanDyke@dnr.mo.gov>]
Sent: Thursday, July 03, 2014 7:57 AM
To: Gravatt, Dan
Subject: MEW

Comments should be forth-coming hopefully today. Mgt hasn't commented yet.

Donald Van Dyke
Superfund Section
Missouri Department of Natural Resources

Celebrating 40 years of taking care of Missouri's natural resources. To learn more about the Missouri Department of Natural Resources visit dnr.mo.gov

July 9, 2014

Daniel R. Gravatt, PG
US EPA Region 7 SUPR/MOKS
11201 Renner Blvd., Lenexa, KS 66219

Dear Mr. Gravatt:

I have reviewed the Third-Five Year Review Report (Review) for the Missouri Electric Works Site (MEWS) in Cape Girardeau, Cape Girardeau County, Missouri. I have some major concerns on the behalf of the State of Missouri.

I agree with the conclusion, based on the data collected by EPA's contractor that further characterization of residual on-site contamination warrants investigation. The levels of Polychlorinated Biphenyl (PCB) contamination detected on-site and in the ravine area pose serious question as to the protectiveness of the remedy.

The data collected by EPA's contractor clearly indicate there is potential risk to any future development in alluvial bottoms area, specifically exposure to contamination that may have resulted from alluvium prior to the placement of fill in the bottom area. This investigation needs to be initiated immediately.

Fish tissue data collected for the Review in the alluvial bottom pond indicated a level of PCB contamination in excess of safe levels for human consumption. (Reference 6/19/2014 @ 9:15 am e-mail from Dennis Wambuguh). Although fencing is in place, this issue needs immediate attention of the Missouri Electric Works Steering Committee (MEWSC). The investigation must address the pond and any potential exposures in the stream both upstream and downstream of the ponded area.

I feel that the volatile organic contamination in the groundwater at MW-16 A, B and C is a concern. However, the continued decrease in the levels is reassuring that natural attenuation may alleviate this issue.

The remaining groundwater contaminants emanating from the MEWS into the alluvial bottom need further investigation. The potential for migration through fracture flow has not been fully characterized.

The implementation of institutional controls (ICs) at the site is the responsibility of the MEWSC as part of the Remedial Action/Remedial Design. Enforcement of the ICs will be the responsibility of the City or State.

In conclusion, the delays in the investigation and remediation at the MEWS need resolution. The potential risks are clearly indicated by the data collected during the Review. The State requests the negotiations with the MEWSC be resolved in a timely manner so potential risks at the MEWS and the associated alluvial bottoms area are addressed.

Sincerely,

HAZARDOUS WASTE PROGRAM

Donald F. Van Dyke
Project Manager

Don Van Dyke
Superfund Section
Missouri Department of Natural Resources

Dear Mr. Van Dyke:

The EPA has received your letter dated July ##, 2014 transmitting your comments on the draft Third Five Year Review report for the Missouri Electric Works Superfund site in Cape Girardeau, Missouri. Most of your comments were not of a nature that could be directly addressed in the Five Year Review, so EPA felt it appropriate to respond directly to the concerns you raised in your letter.

The Third Five Year Review report does call for additional investigation of the newly-discovered PCB detections in the surface soil over the 10 milligrams per kilogram cleanup standard specified in the 1990 OU-1 ROD, as acknowledged in your letter. EPA agrees with your recommendation to expeditiously investigate the contamination in the sediments and the alluvial bottom pond in OU-3, and is in the process of negotiating an Administrative Order on Consent with the Missouri Electric Works Steering Committee that will compel MEWSC to conduct an RI/FS for OU-3.

EPA does not understand your statements requesting further investigation and characterization of contaminant migration through fracture flow into the alluvial aquifer. This issue, among others, was evaluated in the OU-2 RI/FS and addressed to the extent practicable in the 2005 OU-2 ROD, with which MDNR concurred. The technical impracticability waiver selected for the fractured bedrock aquifer portion of OU-2 is an acknowledgement that there are no technologies available to address any such migration that might be occurring. Future monitored natural attenuation sampling in the OU-2 alluvial aquifer will allow EPA to determine if additional contaminants migrate to this aquifer and help inform any additional remedial actions that might become necessary.

EPA appreciates MDNR's participation in the Five Year Review process for MEW. If you have any additional concerns or questions, please contact me at (913) 551-7324.

Sincerely,

Daniel R. Gravatt, PG
Missouri-Kansas Remedial Branch
Superfund Division